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9 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 CHRISTOPHER BACON,
11
12 Plaintiff,

13 vs.

14 JOSUEL FELICITE MUSAMBAGHANI;
15 MICROSOFT CORPORATION; and DOES
16 I-X; and ROE CORPORATIONS XI-XX,
inclusive,
17 Defendants.

CASE NO.: 2:24-cv-00009-MMD-EJY

**JOINT MOTION TO EXTEND DEADLINE
TO FILE JOINT PRETRIAL ORDER TO
APRIL 22, 2025**

18 COMES NOW, Plaintiff, CHRISTOPHER BACON (“Plaintiff”), by and through his
19 counsel of record, SCHUETZE, McGAHA, TURNER & FERRIS PLLC; and Defendant,
20 JOSUEL FELICITE MUSAMBAGHANI (“Defendant”), by and through his counsel of record,
21 IVIE McNEILL WYATT PURCELL & DIGGS, and hereby ask this Court to extend the
22 deadline to submit the parties’ Joint Pretrial Order from the current deadline, April 17, 2025, to
23 Tuesday, April 22, 2025.

24 On August 14, 2024, an order was entered extending the pretrial dates including the
25 deadline to submit the Pretrial Order to Thursday, April 17, 2025. Counsel for the parties met
26 and conferred on March 18, 2025, and agreed to draft a Joint Pretrial Order due to agreements
27 as to the material issues in dispute and future handling.
28

On March 21, 2025, counsel for the Defendant submitted a draft of the Joint Pretrial Order to counsel for the Plaintiff for review and edit including addition of his list of exhibits. On April 15, 2025, counsel for the Plaintiff returned the revised Joint Pretrial Order including a list of exhibits. Currently, counsel for the Defendant is editing the Joint Pretrial Order including the defense list of exhibits and objections to the plaintiff's list of exhibits. Thereafter, counsel for the plaintiff must be given the opportunity to revise the Joint Pretrial Order to include objections to the defense exhibits.

The counsel for the parties continue to work diligently to timely submit the Joint Pretrial Order, however, two additional business days are necessary to finalize and submit the same and accordingly request an extension to Tuesday, April 22, 2025.

IT IS SO STIPULATED.

DATED this 17th day of April, 2025.

SCHUETZE, McGAHA, TURNER &
FERRIS, PLLC

/s/ William W. McGaha, Esq.

WILLIAM W. McGAHA, ESQ.
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DATED this 17th day of April, 2025.

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IT IS SO ORDERED.

DATED: April 17, 2025

Raymond J. Zouchak
UNITED STATES MAGISTRATE JUDGE